UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

MOTORS LIQUIDATION COMPANY
f/k/a GENERAL MOTORS CORPORATION,
et al.,

                    Debtors.

AFFIDAVIT OF CREDITOR

CHAPTER 11 CASE NO.
09-50026 (REG)

(Jointly Administered)

STATE NEW YORK   )
) ss:
COUNTY OF DUTCHESS)

SANDRA O. CACCOMA, being duly sworn, deposes and says:

I reside at 4676 Albany Post Road, Apt. 6C2, Hyde Park, NY 12538. My date of birth is July 7, 1959.

I submit this affidavit in opposition to Motors Liquidation Company's (f/k/a General Motors Corporation) ("Debtors") request/motion to bar my claim as a creditor of the Debtors as explained below.

I retained Steven M. Melley, Esq., a personal injury attorney, with respect to bodily injuries and other damages I sustained as a result of my motor vehicle accident on July 12, 2008 when I was involved in a one-vehicle motor vehicle accident. At the time and place of the accident, I was driving home from Kingston Hospital in Kingston, New York, where I was working as a registered nurse. I was operating my 1997 Pontiac generally southbound on New York State Route 9G in the Town of Rhinebeck, Dutchess County, New York in the southbound lane of the two designated lanes, one north, one south. Suddenly and without warning my driver's air bag deployed without warning. In a split second my vehicle continued straight as the road curved to my right. I hung onto the steering wheel as my vehicle continued straight, across

1

the northbound lane, onto the shoulder and struck one or more trees. I had no ability to prevent the loss of control of the vehicle to avoid hitting the tree(s).

Before any lawsuit could be filed in my case, General Motors filed for bankruptcy in June 2009.

Prior to November 25, 2009, I received by mail a copy of the "Notice of Deadlines for Filing Proofs of Claim" and made an appointment with my attorney, Mr. Melley to sign the Proof of Claim form.

On November 25, 2009, I met with Mr. Melley at his office. At that time, I signed and dated the Proof of Claim form and signed an affidavit that had been drafted on my behalf to accompany the Proof of Claim form. It was my understanding and expectation that my Proof of Claim form would be mailed to the claims agent by Mr. Melley's office before the stated "filing date" of November 30, 2009 and that it would be received and filed with the claims office on or before November 30, 2009. I acted in good faith to file my Proof of Claim before the November 30, 2009 filing date.

After filing the Proof of Claim form, I continued to receive various updates regarding the bankruptcy proceedings, which I would forward to Mr. Melley's office including those regarding alternative dispute resolution, which I intended to participate in.

I was not aware that my Proof of Claim form had been deemed received one day late until received a copy of the "NOTICE OF DEBTORS' 111TH OMNIBUS OBJECTION TO CLAIMS AND MOTION REQUESTING ENFORCEMENT OF BAR DATE ORDERS (Late-Filed Claims) dated December 20, 2010 – over one year after my Proof of Claim was filed. According to Exhibit A, of the above papers, my Proof of Claim form had allegedly been received on December 1, 2009 rather than November 30, 2009.

For the reasons stated in Mr. Melley's affirmation, I respectfully request that this Court

deny the Debtors motion to bar my claim and permit my claim to be accepted.

Dated: January 24, 2011

/s/ SANDRA CACCOMA

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SANDRA CACCOMA, Creditor

INDIVIDUAL VERIFICATION

STATE OF NEW YORK   )
)   **ss.:**

COUNTY OF DUTCHESS   )

SANDRA O. CACCOMA, being duly sworn, says:

I am a creditor in the action herein; I have read the annexed affidavit and know the
contents thereof and the same are true to my knowledge, except those matters therein which are
stated to be alleged on information and belief, and as to those matters I believe them to be true.
My belief, as to those matters therein not stated upon knowledge, is based upon the following:
personal knowledge and file information.

/s/ SANDRA CACCOMA

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SANDRA O. CACCOMA

Sworn to before me this

_____ day of January, 2011

/s/ KEVIN J. RUMSEY

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Notary Public